

PHILLIP A. TALBERT  
United States Attorney  
ROSS PEARSON  
Assistant United States Attorney  
501 I Street, Suite 10-100  
Sacramento, CA 95814  
Telephone: (916) 554-2700  
Facsimile: (916) 554-2900

Attorneys for Plaintiff  
United States of America

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
STEVEN DANIEL WOODS,  
  
Defendant.

CASE NO. 2:21-CR-00100-JAM  
  
STIPULATION REGARDING EXCLUDABLE  
TIME PERIODS UNDER SPEEDY TRIAL ACT;  
ORDER  
  
DATE: February 15, 2022  
TIME: 9:30 a.m.  
COURT: Hon. John A. Mendez

**STIPULATION**

Plaintiff United States of America, by and through its counsel of record, and defendant, by and through defendant's counsel of record, hereby stipulate as follows:

1. By previous order, this matter was set for status on February 15, 2022.
2. By this stipulation, defendant now moves to continue the status conference until May 24, 2022, at 9:30 a.m., and to exclude time between February 15, 2022, and May 24, 2022, under Local Code T4.
3. The parties agree and stipulate, and request that the Court find the following:
  - a) The government has represented that the discovery associated with this case includes over one hundred pages of reports, photos, and search warrant documents. All of this discovery has been either produced directly to counsel and/or made available for inspection and copying.

b) Counsel for defendant desires additional time to review the discovery with her client, research and investigate possible defenses, discuss any potential resolution with her client, research mitigating evidence and present it to the prosecution, and otherwise prepare for trial.

c) Counsel for defendant believes that failure to grant the above-requested continuance would deny him/her the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.

d) The government does not object to the continuance.

e) Based on the above-stated findings, the ends of justice served by continuing the case as requested outweigh the interest of the public and the defendant in a trial within the original date prescribed by the Speedy Trial Act.

f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, et seq., within which trial must commence, the time period of February 15, 2022 to May 24, 2022, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4] because it results from a continuance granted by the Court at defendant's request on the basis of the Court's finding that the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial.

4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

IT IS SO STIPULATED.

Dated: February 10, 2022

PHILLIP A. TALBERT  
United States Attorney

/s/ ROSS PEARSON  
ROSS PEARSON  
Assistant United States Attorney

Dated: February 10, 2022

/s/ LINDA ALLISON

LINDA ALLISON

Counsel for Defendant

STEVEN DANIEL WOODS

(Authorized by email on

February 10, 2022)

**FINDINGS AND ORDER**

IT IS SO FOUND AND ORDERED this 10<sup>th</sup> day of February, 2022.

/s/ John A. Mendez

THE HONORABLE JOHN A. MENDEZ

UNITED STATES DISTRICT COURT JUDGE